

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	:
Plaintiff,	:
v.	:
SENTINEL MANAGEMENT GROUP, INC., ERIC A. BLOOM AND CHARLES K. MOSLEY,	:
Defendants.	:
COMMODITY FUTURES TRADING COMMISSION,	:
Plaintiff,	:
v.	:
SENTINEL MANAGEMENT GROUP, INC., ERIC A. BLOOM AND CHARLES K. MOSLEY,	:
Defendants.	:

PROPOSED JOINT DISCOVERY PLAN

Plaintiffs United States Securities and Exchange Commission and Commodity Futures Trading Commission, on behalf of the parties in the above-captioned actions *United States Securities and Exchange Commission v. Sentinel Management Group, Inc. et al.*, Case No. 07 C 4684 (the “SEC Action”), and *Commodity Futures Trading Commission v. Sentinel Management Group, Inc. et al.*, Case No. 08 C 2410 (the “CFTC Action”), respectfully submit this Proposed

Joint Discovery Plan (“Plan”). On January 28, 2009, the parties in both actions appeared before the Court for a status conference. At the status conference, the Court requested that the parties confer regarding a discovery schedule and submit a written proposal in advance of the status conference on April 1, 2009. The parties have conferred and reached agreement regarding the Plan as set forth herein.

The Plan provides as follows:

1. The Plan shall govern discovery proceedings in each of the SEC Action and the CFTC Action. The Plan shall apply to each action separately and independently of the other action.
2. The parties in each action shall exchange written statements identifying the subject matters on which they expect to submit expert testimony by December 15, 2009. Written statements under this paragraph may be amended or supplemented at any time consistent with the requirements in paragraphs 4 and 5 below. This paragraph shall not alter or modify the parties’ obligations under Rule 26.
3. Fact discovery shall be completed by January 29, 2010. All discovery requests, whether issued to parties or non-parties, shall be served with sufficient time for the requested discovery to be obtained prior to the fact discovery deadline. In addition, any motions to compel must be filed prior to the fact discovery deadline.
4. The parties in each action shall make expert disclosures pursuant to Fed. R. Civ. P. 26, including written reports, by March 5, 2010.

5. The parties in each action shall make rebuttal expert disclosures pursuant to Fed. R. Civ. P. 26, including written reports, by April 5, 2010.
6. Expert discovery in each action shall be completed by May 5, 2010.
7. To facilitate coordination of discovery in the SEC Action and the CFTC Action, the parties will provide timely notice of depositions and subpoenas in connection with either one of the actions to all parties in both actions. Such notice shall be provided in the same manner as would be required pursuant to the Federal Rules of Civil Procedure if the parties were all in one action.
8. When practicable, the parties in the two actions will attempt to coordinate deposition discovery such that they will conduct depositions jointly and witnesses will not be required to appear more than once to be deposed in connection with the two actions.
9. The plaintiff in each action shall be permitted to take up to twenty-five depositions. Depositions taken by the plaintiff in one action, and conducted jointly with the second action, shall also count toward the deposition limit for the plaintiff in the second action. The defendants in each action together shall be permitted to take up to twenty-five depositions. Depositions taken by a defendant in one action, and conducted jointly with the second action, shall also count toward the deposition limit for the defendants in the second action.
10. The limitation in Fed. R. Civ. P. 30(d)(2) that depositions shall not exceed one day of seven hours shall not apply to the Actions.

11. The parties in each action shall appear before this Court for status conferences every 90 days, or at such other regular intervals as the Court may order, to report on the progress of discovery.
12. The dates set forth in the Plan shall be extended or modified only on the Court's own motion or upon motion by a party for good cause shown.

Dated: March 30, 2009

Respectfully submitted,

/s/ Andrea R. Wood

Andrea R. Wood
John E. Birkenheier
Eric M. Phillips
Daniel S. Ryan
Securities and Exchange Commission
175 W. Jackson Blvd., Suite 900
Chicago, IL 60604
Telephone: (312) 353-7390
Facsimile: (312) 353-7398

*Attorneys for Plaintiff United States
Securities and Exchange Commission*

/s/ Brigitte C. Weyls

Mark Howard Bretscher
Brigitte C. Weyls
Commodity Futures Trading
Commission
525 W. Monroe Street, Suite 1100
Chicago, IL 60661
312-596-0529 (Bretscher)
312 596-0545 (Janulis)
(312) 596-0520 (Hollinger)
(312) 596-0547 (Weyls)
(312) 596-0700 (office number)
(312) 596-0714 (facsimile)

*Attorneys for Plaintiff Commodity
Futures Trading Commission*

CERTIFICATE OF SERVICE

I, Brigitte C. Weyls, an attorney, certify that on March 30, 2009, I caused a copy of the attached **Proposed Joint Discovery Plan**, to be served upon the following parties via CM/ECF:

SERVICE LIST

Attorneys for Frederick J. Grede, as Chapter 11 Trustee of Sentinel Management Group, Inc.

Chris C. Gair (cgair@jenner.com)
Vincent E. Lazar (vlazar@jenner.com)
Jeffrey Scott Eberhard (jeberhard@jenner.com)
Jenner & Block LLP
330 North Wabash Avenue
43rd Floor
Chicago, Illinois 60611
(312) 222-9350 (Phone)
(312) 527-0484 (fax)

Attorneys for Defendant Eric A. Bloom

Terence H. Campbell (tcwolfram@aol.com)
Theodore Thomas Poulos (tppoulos@aol.com)
Matthew S. Ryan (mryan@cotsiriloslaw.com)
Cotsirilos, Tighe & Streicker, Ltd.
33 North Dearborn, Suite 600
Chicago, Illinois 60602
(312) 263-0345 (Phone)
(312) 263-4670 (fax)

Attorney for Defendant Charles K. Mosley

Stephen I. Peck (specklaw@hotmail.com)
City of Chicago, Department of Law
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
(312) 744-9010 (Phone)

/s/ Brigitte C. Weyls
Brigitte C. Weyls
Senior Trial Attorney
Commodity Futures Trading Commission
525 West Monroe, Suite 1100
Chicago, Illinois 60661
(312) 596-0547 (Phone)
(312) 596-0714 (Fax)
bweyls@cftc.gov